

3. Is the applicant in compliance with the provisions of Section 310 of the Communications Act of 1934, as amended, relating to interests of aliens and foreign governments? ☒ Yes ☐ No
- If No, attach as Exhibit No. \_\_\_\_\_ an explanation.
4. Since the filing of the applicant's last renewal application for this station or other major application, has an adverse finding been made or final action been taken by any court or administrative body with respect to the applicant or parties to the application in a civil or criminal proceeding, brought under the provisions of any law relating to the following: any felony; broadcast related antitrust or unfair competition; criminal fraud or fraud on another governmental unit; or discrimination? ☐ Yes ☒ No
- If Yes, attach as Exhibit No. \_\_\_\_\_ a full description of the persons and matters involved, including an identification of the court or administrative body and the proceeding (by dates and file numbers) and the disposition of the litigation.
7. Would a Commission grant of this application come within 47 C.F.R. Section 1.1307, such that it may have a significant environmental impact? ☐ Yes ☒ No
- If Yes, attach as Exhibit No. \_\_\_\_\_ an Environmental Assessment required by 47 C.F.R. Section 1.1311.
- If No, explain briefly why not. See statement attached
- Has the applicant placed in its station's public inspection file at the appropriate times the documentation required by 47 C.F.R. Sections 73.3526 or 73.3527? ☒ Yes ☐ No
- If No, attach as Exhibit No. \_\_\_\_\_ a complete statement of explanation.

— The APPLICANT hereby waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

— The APPLICANT acknowledges that all the statements made in this application and attached exhibits are considered material presentations and that all the exhibits are a material part hereof and are incorporated herein as set out in full in the application.

**CERTIFICATION:** I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith.

Name The Rev. Dr. Ralph A. Bohlmann	Signature <i>Ralph A. Bohlmann</i>
Title President	Date Sep. 27, 1989

— WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND IMPRISONMENT. U.S. CODE, TITLE 18, SECTION 1001.

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# BROADCAST EQUAL EMPLOYMENT OPPORTUNITY PROGRAM REPORT

(To be filed with broadcast license renewal application)

(For FCC Use Only)

Call Letters KFUO

Code No.

Name of Licensee The Luthran Church - Missouri Synod

City and State which station

is licensed to serve Clayton, Missouri

## TYPE OF BROADCAST STATION (Check one)

Commercial Broadcast Station

Noncommercial Broadcast Station

☒ AM

☐ TV

☐ Educational Radio

☐ AM Station is operated non-commercial.

☐ FM

☐ Low Power TV

☐ Educational TV

☐ Combined AM & FM  
in same area

☐ International

SEND NOTICES AND COMMUNICATIONS TO THE FOLLOWING NAMED PERSON AT THE ADDRESS INDICATED BELOW:

Name	Street Address		
Paul Devantier	85 Founders lane		
City	State	ZIP Code	Telephone No.
St. Louis	MO	63105	( 314 ) 725-3030

## FILING INSTRUCTIONS

Broadcast station licensees are required to afford equal opportunity to all qualified persons and to refrain from discriminating in employment and related benefits on the basis of race, color, national origin, and sex. See Section 73.2080 of the Commission's Rules. Pursuant to these requirements, a license renewal applicant who employs five or more full-time station employees must file a report of its activities to ensure equal employment opportunity for women and minority groups (that is, Blacks not of Hispanic origin, Asians or Pacific Islanders, American Indians or Alaskan Natives, and Hispanics). If minority group representation in the available labor force is less than five percent (in the aggregate), equal employment opportunity (EEO) program information for minority group members need not be filed. However, EEO program information must be filed for women since they comprise a significant percentage of virtually all area labor forces. If an applicant employs fewer than five full-time employees, no equal employment opportunity activity information need be filed.

A copy of this report must be kept in the station's public file. These actions are required to obtain license renewal. Failure to meet these requirements may result in license renewal being delayed or denied. These requirements are contained in Section 73.2080 of the FCC Rules (47 CFR 73.2080), and are authorized by the Communications Act of 1934, as amended.

☐ If your station employs fewer than five full-time employees, check the box at left, complete the certification below, return the form to the FCC, and place a copy in your station's public file. You do not have to complete the rest of the form.

If your station employs five or more full-time employees, you must complete all of this form and follow all instructions.

☐ If minority group representation in the available labor force is less than 5 percent (in the aggregate) and you choose not to file EEO program information for minority groups, check the box at left and complete the rest of this form with only the information for your program directed towards women.

# CERTIFICATION

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This report must be certified, as follows:

- By licensee, if an individual;
- By a partner, if a partnership (general partner, if a limited partnership);
- C. By an officer, if a corporation or an association; or
- D. By an attorney of the licensee, in case of physical disability or absence from the United States of the licensee.

**WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND IMPRISONMENT.  
U.S. CODE, TITLE 18, SECTION 1001.**

I certify to the best of my knowledge, information and belief, all statements contained in this report are true and correct.

Signed <i>Ralph A. Bohlen</i>
Title President
Date SEP. 27, 1969
Name of Respondent The Lutheran Church - Missouri Synod
Telephone No. (include area code) 314 725-3030

## CC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

The solicitation of personal information requested in this application is authorized by the Communications Act of 1934, as amended. The principal purpose for which the information will be used is to determine if the license renewal requested is consistent with the public interest. The staff, consisting variously of attorneys, accountants, engineers, and applications examiners, will use the information to determine whether the license renewal application should be granted, denied, dismissed or designated for hearing. If all the information requested is not provided, the application may be returned without action having been taken upon it or its processing may be delayed while a request is made to provide the missing information. Accordingly, every effort should be made to provide all necessary information. Your response is required to obtain the requested authority.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, P.L. 93-579, DECEMBER 31, 1974, 5 U.S.C. 552(a)(3) AND THE PAPERWORK REDUCTION ACT OF 1980, P.L. 96-511, DECEMBER 11, 1980, 44 U.S.C. 3507.

## EQUAL EMPLOYMENT OPPORTUNITY PROGRAM

### I GENERAL POLICY

It is the policy of KFUD and KFUD-FM to provide equal employment opportunity to all qualified individuals without regard to their race, color, religion, national origin or sex in all personnel actions including recruitment, evaluation, selection, promotion, compensation, training and termination.

It is also our policy to promote the realization of equal employment opportunity through a positive, continuing program of specific practices designed to ensure the full realization of equal employment opportunity without regard to race, color, religion, national origin or sex.

To make this policy effective, and to ensure conformance with the Rules and Regulations of the Federal Communications Commission, we have developed an Equal Employment Opportunity Program which includes the following elements:

### II RESPONSIBILITY FOR IMPLEMENTATION

Paul Devantier, Executive Director, is responsible for the administration and implementation of our Equal Employment Opportunity Program. It is also the responsibility of all persons making employment decisions with respect to recruitment, evaluation, selection, promotion, compensation, training and termination of employees to ensure that our policy and program is adhered to and that no person is discriminated against in employment because of race, color, religion, national origin or sex.

### III POLICY DISSEMINATION

To assure that all members of the staff are cognizant of our equal employment opportunity policy and their individual responsibilities in carrying out this policy, the following communication efforts are made:

The station's employment application form contains a notice informing prospective employees that discrimination because of race, color, religion, national origin or sex is prohibited and that they may notify the appropriate local, state, or federal agency if they believe they have been the victims of discrimination.

Appropriate notices are posted informing applicants and employees that the station is an Equal Opportunity Employer and of their right to notify an appropriate local, state, or federal agency if they believe they have been the victim of discrimination.

#### IV RECRUITMENT

When vacancies occur, it is the policy of KFUO and KFUO-FM to seek out qualified minority and female applicants. We deal only with employment services, including state employment agencies, which refer job candidates without regard to their race, color, religion, national origin or sex. We contact the various employment services and actively seek female and minority referrals and we specifically request them to provide us with qualified female and minority referrals. See sample reply form attached.

When utilizing media for recruitment purposes, help-wanted advertisements always include a notice that we are an Equal Opportunity Employer and contain no indication, either explicit or implied, of a preference for one sex over another.

We encourage present employees, particularly minority and female employees to refer minority and female candidates for existing and future job openings.

#### V TRAINING

We encourage employees to seek additional job-related formal education. We also encourage training through workshops, seminars, etc. Approved training programs qualify employees for time off with pay while acquiring additional education and/or training.

#### VI COMPLAINTS

There have been no complaints filed against the stations during the past licensed period with regard to the stations' employment practices.

#### VII JOB HIRES

During the twelve month period beginning October 1, 1988 and ending September 30, 1989, we hired a total of six persons, two white males and four white females.

#### VIII PROMOTION

It is our policy to provide promotions on a nondiscriminatory basis. Further, to assure that minorities and women are given due consideration for promotional opportunities, special effort is taken to encourage minorities and women to qualify and apply for advancement.

There were no promotions at the stations during the twelve month period prior to the filing of this application.

#### IX EFFECTIVENESS OF AFFIRMATIVE ACTION PLAN

KFUO and KFUO-FM have long been committed to Equal Employment Opportunity and will continue to act affirmatively to maintain that commitment.

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This is to acknowledge that I have received a letter from Station  
KFUO-FM seeking female and minority referrals for job openings  
at the station.

*[Signature]*  
Signature

7-21-89  
Date

The following action [has been] [will be] taken:

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Other organizations to contact:

Name	Address
<hr/>	<hr/>
<hr/>	<hr/>

SUBMITTED BY  
**SNELLING & SNELLING**  
PERSONNEL CONSULTANTS  
77 West Port Plaza, Suite 416  
PHONE: 878-5500  
St. Louis, Mo. 63146

85 FOUNDERS LANE  
ST. LOUIS, MO. 63105  
(314) 725-0099



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CLASSIC 99

7/6/92

Marcia Cranberg

Dear Marcia:

I have began to examine the additional questions asked by the FCC regarding the EE issue.

Rather than wait for my full response, I wanted you to look at the first question, and get your thoughts about it.

The other three questions are informational in nature.

I agree with the question asked by FCC and do not have a ready explanation. I did count 14 persons hired over the period of October 1, 1988 to September 30, 1989:

Full time:

- Bob Thomson 10/24/88
- James Bebo 2/22/89
- Carolyn Miller 5/15/89
- Wynn Bressler 9/18/89
- Lucy Walker 3/20/89
- Glynelle Wells 3/20/89
- Frank Wood 6/19/89
- Angela Burger 9/8/89
- Christine Keseman 8/23/89

Part time:

- Robert Armbruster 8/18/89
- Eugene Ficker 3/3/89
- Jeffery Meyer 4/10/89
- Daniel Ramsey 4/24/89

(Secretary, this is the "lower-level" position. She was rehired after a maternity leave)

David Schultz 9/25/89

Page 4 of the EEO supplement does state we hired a total of six persons.

I'll continue to work on the rest of it.

85 FOUNDERS LANE  
ST. LOUIS, MO. 63105  
(314) 725-0099

*[Handwritten signature]*